

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                                 |   |  |
|---------------------------------|---|--|
| <b>UNITED STATES OF AMERICA</b> | : | <b>CRIMINAL NO.</b> ____                           |
|                                 | : |  |
| <b>v.</b>                       | : | <b>DATE FILED:</b> _____                           |
|                                 | : |  |
| <b>ELAINE HUNTER-MORRIS</b>     | : | <b>VIOLATIONS:</b>                                 |
|                                 | : | <b>26 U.S.C. § 7206(2) (aiding or assisting in</b> |
|                                 | : | <b>tax preparation of false federal income</b>     |
|                                 | : | <b>tax returns - 25 counts)</b>                    |

**INDICTMENT**

**COUNTS ONE THROUGH TWENTY-FIVE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Defendant ELAINE HUNTER-MORRIS was self-employed as a tax preparer, who assisted customers in preparing tax returns for a fee.
2. In 2003, defendant ELAINE HUNTER-MORRIS established ELAINE HUNTER Tax Prep. She used her residence in Philadelphia, Pennsylvania, and 4851 N. 18<sup>th</sup> Street in Philadelphia, Pennsylvania, to conduct her business.
4. In most instances, defendant ELAINE HUNTER-MORRIS had her clients complete an income tax questionnaire containing basic information such as the client's name, address, social security number, and dependent information. Defendant HUNTER-MORRIS obtained the clients' tax documents, including W-2 forms and mortgage interest statements, from the clients and prepared the tax returns while the clients were not present. Defendant HUNTER-MORRIS did not ask the clients many questions and did not review the returns with them.

5. On the returns that she prepared for her clients, defendant ELAINE HUNTER-MORRIS followed a practice of falsely overstating deductions, such as business expenses and charitable contributions, and including deductions for which there was no basis in fact. In addition, defendant HUNTER-MORRIS falsely inflated Schedule C and Schedule E expenses and included false dependents on the returns of some of her clients. In making these false statements in the returns she prepared defendant HUNTER-MORRIS intended to reduce the amount of tax owed by the clients and increase any refunds due to the clients.

6. Defendant ELAINE HUNTER-MORRIS included these materially false and fraudulent deductions on her clients' returns without the authorization of those clients. As a result of these fraudulent deductions, defendant HUNTER-MORRIS's clients received approximately \$132,241.64 in fraudulently inflated income tax refunds.

7. On or about the dates listed below, in the Eastern District of Pennsylvania, defendant

**ELAINE HUNTER-MORRIS**

willfully aided, assisted, procured, counseled, and advised the preparation and presentation, under or in connection with, matters arising under the internal revenue laws of the United States, of tax returns and other documents which were false or fraudulent as to a material matter.

| Count | Taxpayer    | Tax Year | Date Return Filed | Falsity   |
|-------|-------------|----------|-------------------|---|
| 1     | D. & F.C-R. | 2004     | 4/15/05           | Charitable contributions, deductions for employee business expenses |
| 2     | D. & F.C-R. | 2005     | 4/17/06           | Charitable contributions, deductions for employee business expenses |

| <b>Count</b> | <b>Taxpayer</b> | <b>Tax Year</b> | <b>Date Return Filed</b> | <b>Falsity</b>  |
|--------------|-----------------|-----------------|--------------------------|---|
| 3            | F. & E.N.       | 2005            | 4/17/06                  | Charitable contributions, deductions for employee business expenses                   |
| 4            | F. & E.N.       | 2006            | 4/15/07                  | Deductions for employee business expenses   |
| 5            | I. & M.M.       | 2004            | 4/15/05                  | Charitable contributions, deductions for employee business expenses                   |
| 6            | I. & M.M.       | 2005            | 4/17/06                  | Charitable contributions, deductions for employee business expenses                   |
| 7            | J.R.            | 2004            | 4/4/06                   | Charitable contributions, deductions for employee business expenses                   |
| 8            | J.R.            | 2005            | 4/17/06                  | Charitable contributions, deductions for employee business expenses                   |
| 9            | J.R.            | 2006            | 4/15/07                  | Deductions for employee business expenses   |
| 10           | M. & D.B.       | 2004            | 4/15/05                  | Charitable contributions, deductions for employee business expenses                   |
| 11           | M.B.            | 2005            | 4/17/06                  | Charitable contributions, deductions for employee business expenses                   |
| 12           | M.M.            | 2004            | 4/15/05                  | Charitable contributions, deductions for employee business expenses; false dependents |
| 13           | M.M.            | 2005            | 4/17/06                  | False dependents  |
| 14           | M.M.            | 2006            | 4/15/07                  | False dependents  |

| <b>Count</b> | <b>Taxpayer</b> | <b>Tax Year</b> | <b>Date Return Filed</b> | <b>Falsity</b>  |
|--------------|-----------------|-----------------|--------------------------|---|
| 15           | O. & J.M.       | 2004            | 3/29/06                  | Charitable contributions, deductions for employee business expenses |
| 16           | O. & J.M.       | 2005            | 4/17/06                  | Charitable contributions, deductions for employee business expenses |
| 17           | R.M.            | 2004            | 4/15/05                  | Charitable contributions, deductions for employee business expenses |
| 18           | R.M.            | 2005            | 4/17/06                  | Charitable contributions, deductions for employee business expenses |
| 19           | R.M.            | 2006            | 4/15/07                  | Charitable contributions, deductions for employee business expenses |
| 20           | V.M.            | 2004            | 4/15/05                  | Charitable contributions, deductions for employee business expenses |
| 21           | V.M.            | 2005            | 4/17/06                  | Charitable contributions, deductions for employee business expenses |
| 22           | V.M.            | 2006            | 4/15/07                  | Deductions for employee business expenses                           |
| 23           | W. & L.R.       | 2004            | 4/15/05                  | Itemized deductions   |
| 24           | W. & L.R.       | 2005            | 4/17/06                  | Itemized deductions   |
| 25           | W. & L.R.       | 2006            | 4/15/07                  | Itemized deductions   |

All in violation of Title 26, United States Code, Section 7206(2).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**MICHAEL L. LEVY**  
**United States Attorney**